May 9, 2003

Country of Origin Labeling Program Agricultural Marketing Service, USDA Stop 0249 room 2092-S 1400 Independence Avenue, SW Washington, DC 20250-0249

To Whom it May Concern:

Concerning the country of origin labeling program, first and foremost, use some common sense and stick to the intent of the law. Close any loop holes. For example enhancing a commodity with water, flavoring, salt or seasonings or cooking, curing or roasting or restructuring should not exclude a commodity from label requirements.

USDA can require all imported livestock to have a permanent mark or brand indicating country of origin. Anything not marked this way can be considered born and raised in the USA. No extra recording would be required by US producers.

It seems like packers and retailers are trying to make a mountain out of a mole hill by trying to impose more regulations on producers and everyone else down the chain of sales. If the sale document to the retailer says USA that is all the packer or retailer needs to be concerned with. It would seem also that the scare tactics of outrageous costs to implement the program has more to do with packer bottom line than producer inconvenience and expense. Blending cheap imports with USA grown commodities would be labeled as such, giving the consumer the choice.

There needs to be a transition time when all livestock can be cleared for sale without affecting price.

Again, minimize the rules. If the commodity has been out of the USA at any stage, it is to be labeled as such.

Thanks for your consideration.

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